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8 *Attorneys for Complainant*

9
10 **BEFORE THE**
11 **MEDICAL BOARD OF CALIFORNIA**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

13 In the Matter of the Accusation Against:

Case No. 800-2016-025895

14 **DAVID M. MORROW, M.D.**
15 **116 N. Paul Drive**
Beverly Hills, CA 90210

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

16 **Physician's and Surgeon's Certificate**
17 **No. C33963,**

18 Respondent.

19
20 **FINDINGS OF FACT**

21 1. On or about October 23, 2017, Complainant Kimberly Kirchmeyer, in her official
22 capacity as the Executive Director of the Medical Board of California, filed Accusation No. 800-
23 2016-025895 against David M. Morrow, M.D. (Respondent) before the Medical Board of
24 California. A true and correct copy of the Accusation, the related documents, and Declaration of
25 Service are attached as Exhibit 1 to the separate accompanying "Default Decision Evidence
26 Packet," and are incorporated by reference as if fully set forth herein.¹

27 ¹ The Exhibits referred to herein, which are true and correct copies of the originals, are contained
28 in the separate accompanying "Default Decision Evidence Packet."

1 2. On or about January 7, 1972, the Medical Board of California (Board) issued
2 Physician's and Surgeon's Certificate No. C33963 to Respondent. (Exhibit 2, Certificate of
3 Licensure.)

4 3. On or about October 23, 2017, Richard M. Acosta (Acosta), an employee of the
5 Board, served by Certified Mail a copy of Accusation No. 800-2016-025895, Statement to
6 Respondent, Notice of Defense, Request for Discovery, and Government Code sections 11507.5,
7 11507.6, and 11507.7, to Respondent's address of record with the Board, which was and is: 116
8 N. Paul Drive, Beverly Hills, CA 90210. (Exhibit 3, Declaration of Richard M. Acosta in
9 Support of Default Decision and Order.)

10 4. On or about October 31, 2017, the aforementioned documents were returned by the
11 U.S. Postal Service marked, "Return to Sender, Not Deliverable as Addressed, Unable to
12 Forward." Someone also wrote "Fled the Country" on the envelope. (Exhibit 4, Returned
13 Certified Mail Received by the Board on October 31, 2017.)

14 5. Service of the Accusation was effective as a matter of law under the provisions of
15 Government Code section 11505, subdivision (c).

16 6. On or about November 14, 2017, a Courtesy Notice of Default and copies of
17 Accusation No. 800-2016-025895, the related documents, and Declaration of Service were served
18 by Certified, First Class Mail, and e-mail on Respondent at his address of record with the Board,
19 which was and is: 116 N. Paul Drive, Beverly Hills, CA 90210. These documents were also e-
20 mailed to Respondent at the following address: drmorrow@morrowinstitute.com. (Exhibit 5,
21 Declaration of Deputy Attorney General Christine A. Rhee in Support of Default Decision and
22 Order; and Exhibit 6, Courtesy Notice of Default, Accusation No. 800-2016-025895, Statement to
23 Respondent, Notice of Defense, Request for Discovery, Government Code Sections 11507.5,
24 11507.6, and 11507.7, and Declaration of Service dated November 14, 2017.)

25 7. On or about November 19, 2017, the Attorney General's Office received an automatic
26 e-mail stating that the e-mail sent to drmorrow@morrowinstitute.com was undeliverable.
27 (Exhibit 7, E-mail dated November 19, 2017.)

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1 8. On or about November 27, 2017, the Courtesy Notice of Default and copies of
2 Accusation No. 800-2016-025895, the related documents, and Declaration of Service served by
3 Certified Mail were returned by the U.S. Postal Service, marked "unable to forward/for review."
4 Someone also wrote "Fled the Country" on the envelope. (Exhibit 8, Returned Certified Mail
5 Received by the Attorney General's Office on November 27, 2017.)

6 9. To date, Respondent has not filed a Notice of Defense. (Exhibit 5.)

7 10. Government Code section 11506 states, in pertinent part:

8 "..."

9 "(c) The respondent shall be entitled to a hearing on the merits if the respondent
10 files a notice of defense, and the notice shall be deemed a specific denial of all parts of
11 the accusation not expressly admitted. Failure to file a notice of defense shall
12 constitute a waiver of respondent's right to a hearing, but the agency in its discretion
13 may nevertheless grant a hearing."

14 "..."

15 11. Respondent failed to file a Notice of Defense within 15 days after service upon him
16 of the Accusation, and therefore waived his right to a hearing on the merits of Accusation No.
17 800-2016-025895.

18 12. California Government Code section 11520 states, in pertinent part:

19 "(a) If the respondent either fails to file a notice of defense or to appear at the
20 hearing, the agency may take action based upon the respondent's express admissions or
21 upon other evidence and affidavits may be used as evidence without any notice to
22 respondent."

23 "..."

24 13. Pursuant to its authority under Government Code section 11520, the Board finds
25 Respondent is in default. The Board will take action without further hearing and, based on
26 Respondent's express admissions by way of default and the evidence before it, contained in
27 Exhibits 1 through 12, finds that the allegations in Accusation No. 800-2016-025895 are true and
28 correct.

1 14. Business and Professions Code section 2227 states:

2 “(a) A licensee whose matter has been heard by an administrative law judge
3 of the Medical Quality Hearing Panel as designated in Section 11371 of the
4 Government Code, or whose default has been entered, and who is found guilty, or
5 who has entered into a stipulation for disciplinary action with the board, may, in
6 accordance with the provisions of this chapter:

7 “(1) Have his or her license revoked upon order of the board.

8 “(2) Have his or her right to practice suspended for a period not to exceed one
9 year upon order of the board.

10 “(3) Be placed on probation and be required to pay the costs of probation
11 monitoring upon order of the board.

12 “(4) Be publicly reprimanded by the board. The public reprimand may
13 include a requirement that the licensee complete relevant educational courses
14 approved by the board.

15 “(5) Have any other action taken in relation to discipline as part of an order of
16 probation, as the board or an administrative law judge may deem proper.

17 “(b) Any matter heard pursuant to subdivision (a), except for warning letters,
18 medical review or advisory conferences, professional competency examinations,
19 continuing education activities, and cost reimbursement associated therewith that
20 are agreed to with the board and successfully completed by the licensee, or other
21 matters made confidential or privileged by existing law, is deemed public, and
22 shall be made available to the public by the board pursuant to Section 803.1.”

23 15. Section 2234 of the Code, states, in pertinent part:

24 “The board shall take action against any licensee who is charged with
25 unprofessional conduct. In addition to other provisions of this article, unprofessional
26 conduct includes, but is not limited to, the following:

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1 “(a) Violating or attempting to violate, directly or indirectly, assisting in or
2 abetting the violation of, or conspiring to violate any provision of this chapter [Chapter
3 5, the Medical Practice Act].

4 “...

5 “(e) The commission of any act involving dishonesty or corruption which is
6 substantially related to the qualifications, functions, or duties of a physician and
7 surgeon.

8 “...”

9 16. Unprofessional conduct under Business and Professions Code section 2234 is conduct
10 which breaches the rules or ethical code of the medical profession, or conduct which is
11 unbecoming of a member of good standing of the medical profession, and which demonstrates an
12 unfitness to practice medicine. (*Shea v. Board. of Medical Examiners* (1978) 81 Cal.App.3d 564,
13 575.)

14 17. Section 2236 of the Code states, in pertinent part:

15 “(a) The conviction of any offense substantially related to the qualifications,
16 functions, or duties of a physician and surgeon constitutes unprofessional conduct
17 within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record
18 of conviction shall be conclusive evidence only of the fact that the conviction occurred.

19 “...

20 “(c) The clerk of the court in which a licensee is convicted of a crime shall,
21 within 48 hours after the conviction, transmit a certified copy of the record of
22 conviction to the board. The division may inquire into the circumstances surrounding
23 the commission of a crime in order to fix the degree of discipline or to determine if the
24 conviction is of an offense substantially related to the qualifications, functions, or
25 duties of a physician and surgeon.

26 “(d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is
27 deemed to be a conviction within the meaning of this section and Section 2236.1. The

28 ///

1 record of conviction shall be conclusive evidence of the fact that the conviction
2 occurred.”

3 18. California Code of Regulations, title 16, section 1360, states:

4 “For the purposes of denial, suspension or revocation of a license, certificate or
5 permit pursuant to Division 1.5 (commencing with Section 475) of the code, a crime or
6 act shall be considered to be substantially related to the qualifications, functions or
7 duties of a person holding a license, certificate or permit under the Medical Practice
8 Act if to a substantial degree it evidences present or potential unfitness of a person
9 holding a license, certificate or permit to perform the functions authorized by the
10 license, certificate or permit in a manner consistent with the public health, safety or
11 welfare. Such crimes or acts shall include but not be limited to the following: Violating
12 or attempting to violate, directly or indirectly, or assisting in or abetting the violation
13 of, or conspiring to violate any provision of the Medical Practice Act.”

14 19. Respondent has subjected his Physician’s and Surgeon’s Certificate No. C33963 to
15 disciplinary action by reason of the following:

16 a. On or about September 2, 2015, Respondent was federally indicted in the case
17 entitled, *United States of America v. The Morrow Institute Medical Group, Inc., David M.*
18 *Morrow, and Linda Morrow, Defendants*, Case No. SACR15-00099. Respondent was charged
19 with the following: 20 counts of a violation of 18 U.S.C. §§ 1341, 2(a), 2(b) [mail fraud]; one (1)
20 count of a violation of 18 U.S.C. § 1349 [conspiracy to commit mail fraud]; four (4) counts of a
21 violation of 26 U.S.C. § 7206(1) [making or subscribing to a false tax return]; and one (1) count
22 of a violation of 42 U.S.C. §§ 1320d-6(a)(3) and (b)(1) [unlawful disclosure of individually
23 identifiable health information]. (Exhibit 9, Indictment for Case No. SACR15-00099.)

24 b. On or about February 16, 2016, Respondent signed a plea agreement in the case
25 entitled, *United States of America v. The Morrow Institute Medical Group, Inc., David M.*
26 *Morrow, and Linda Morrow, Defendants*, Case No. SACR-15-00099, admitting to the factual
27 basis for Counts 21 and 22 of the Indictment, conspiracy to commit mail fraud and making or
28 subscribing to a false tax return. (Exhibit 10, Plea Agreement for Case No. SACR15-00099.)

1 c. Respondent participated in a scheme to obtain money from the insurance
2 companies by means of false or fraudulent pretenses. More specifically, Respondent submitted
3 altered documents to the insurance companies in support of billings Respondent submitted to the
4 insurance companies. Such altered documents made and facts omitted as part of the scheme were
5 material to the insurance companies' decision to pay claims. While submitting these claims,
6 Respondent had the intent to defraud these insurance companies. Respondent later admitted that
7 the loss from the Respondent's scheme is valued at \$3,491,053.65. (Exhibit 10.)

8 d. On or about March 18, 2016, Respondent formally changed his plea from not
9 guilty to guilty for Counts 21 and 22 of the Indictment for Case No. SACR15-00099. (Exhibit
10 11, Criminal Minutes dated March 18, 2016 for Case No. SACR15-00099.)

11 e. On or about October 2, 2017, Respondent was sentenced *in absentia* for his
12 guilty plea to Counts 21 and 22 of the Indictment. Respondent's sentence included, but was not
13 limited to commitment to the custody of the Bureau of Prisons for a term of 240 months to be
14 followed by supervised release for a term of three (3) years, restitution, mental health treatment,
15 outpatient substance abuse treatment, and abstention from the use of alcohol and the unlawful use
16 of controlled substances. (Exhibit 12, Criminal Minutes dated September 29, 2017 and Judgment
17 and Probation/Commitment Order for Case No. SACR15-00099.)

18 **DETERMINATION OF ISSUES**

19 1. Based on the foregoing findings of fact, Respondent David M. Morrow, M.D., has
20 subjected his Physician's and Surgeon's Certificate No. C33963 to discipline.

21 2. Pursuant to the authority under Government Code section 11520, and based on the
22 evidence before it, the Board hereby finds that the charges and allegations contained in
23 Accusation No. 800-2016-025895, and the Findings of Fact contained in paragraphs 1 through 19,
24 above, and each of them, separately and severally, are true and correct. A true and correct copy
25 of Accusation No. 800-2016-025895, the related documents, and the declaration of service are
26 attached as Exhibit 1.

27 3. The agency has jurisdiction to adjudicate this case by default.

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4. Pursuant to the authority under Government Code section 11520, and by reasons of the Findings of Fact contained in paragraphs 1 through 19, above, the Board is authorized to revoke Respondent's Physician's and Surgeon's Certificate No. C33963 based upon the following violations alleged in Accusation No. 800-2016-025895:

a. Respondent was convicted of a crime substantially related to the qualifications, functions or duties of a physician and surgeon;

b. Respondent committed acts involving dishonesty or corruption that were substantially related to the qualifications, functions, or duties of a physician and surgeon; and

c. Respondent committed general unprofessional conduct.

ORDER

IT IS SO ORDERED that Physician's and Surgeon's Certificate No. C33963, heretofore issued to Respondent David M. Morrow, M.D., is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on January 12, 2018, at 5 p.m.

It is so ORDERED December 14, 2017.

Kimberly Krichuyso

FOR THE MEDICAL BOARD OF CALIFORNIA
KIMBERLY KIRCHMEYER
EXECUTIVE DIRECTOR

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8 *Attorneys for Complainant*

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO OCT 23 2017
BY: [Signature] ANALYST

10 BEFORE THE
11 MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
12 STATE OF CALIFORNIA

13 In the Matter of the Accusation Against:

Case No. 800-2016-025895

14 DAVID M. MORROW, M.D.
116 N. Paul Drive
15 Beverly Hills, CA 90210

ACCUSATION

16 Physician's and Surgeon's Certificate
17 No. C33963,

Respondent.

19
20 Complainant alleges:

21 PARTIES

22 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official
23 capacity as the Executive Director of the Medical Board of California.

24 2. On or about January 7, 1972, the Medical Board issued Physician's and Surgeon's
25 Certificate No. C33963 to David M. Morrow, M.D. (Respondent). The Physician's and
26 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
27 herein and will expire on October 31, 2018, unless renewed.

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3. On February 7, 2017, an Interim Order Imposing Practice Restriction was issued, immediately restricting Respondent's Physician's and Surgeon's Certificate No. C33963 from practicing medicine with the exception of his then-current practice at Lestonnac Free Clinic in Orange, Los Angeles, Riverside, and San Bernardino counties. Respondent's Physician's and Surgeon's Certificate No. C33963 remains restricted as of the date of the filing of this Accusation.

JURISDICTION

4. This Accusation is brought before the Medical Board of California (Board), under the Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

5. Section 2227 of the Code states:

“(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:

"(1) Have his or her license revoked upon order of the board.

“(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

“(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

“(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.

“(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

“(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that

1 are agreed to with the board and successfully completed by the licensee, or other
2 matters made confidential or privileged by existing law, is deemed public, and
3 shall be made available to the public by the board pursuant to Section 803.1.”

4 6. Section 2234 of the Code, states, in pertinent part:

5 “The board shall take action against any licensee who is charged with
6 unprofessional conduct. In addition to other provisions of this article, unprofessional
7 conduct includes, but is not limited to, the following:

8 “(a) Violating or attempting to violate, directly or indirectly, assisting in or
9 abetting the violation of, or conspiring to violate any provision of this chapter [Chapter
10 5, the Medical Practice Act].

11 “...

12 “(e) The commission of any act involving dishonesty or corruption which is
13 substantially related to the qualifications, functions, or duties of a physician and
14 surgeon.

15 “...”

16 7. Unprofessional conduct under Business and Professions Code section 2234 is conduct
17 which breaches the rules or ethical code of the medical profession, or conduct which is
18 unbecoming of a member of good standing of the medical profession, and which demonstrates an
19 unfitness to practice medicine. (*Shea v. Board. of Medical Examiners* (1978) 81 Cal.App.3d 564,
20 575.)

21 8. Section 2236 of the Code states, in pertinent part:

22 “(a) The conviction of any offense substantially related to the qualifications,
23 functions, or duties of a physician and surgeon constitutes unprofessional conduct
24 within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record of
25 conviction shall be conclusive evidence only of the fact that the conviction occurred.

26 “...

27 “(c) The clerk of the court in which a licensee is convicted of a crime shall,
28 within 48 hours after the conviction, transmit a certified copy of the record of

1 conviction to the board. The division may inquire into the circumstances surrounding
2 the commission of a crime in order to fix the degree of discipline or to determine if the
3 conviction is of an offense substantially related to the qualifications, functions, or
4 duties of a physician and surgeon.

5 “(d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is
6 deemed to be a conviction within the meaning of this section and Section 2236.1. The
7 record of conviction shall be conclusive evidence of the fact that the conviction
8 occurred.”

9 9. California Code of Regulations, title 16, section 1360, states:

10 “For the purposes of denial, suspension or revocation of a license, certificate or
11 permit pursuant to Division 1.5 (commencing with Section 475) of the code, a crime or
12 act shall be considered to be substantially related to the qualifications, functions or
13 duties of a person holding a license, certificate or permit under the Medical Practice
14 Act if to a substantial degree it evidences present or potential unfitness of a person
15 holding a license, certificate or permit to perform the functions authorized by the
16 license, certificate or permit in a manner consistent with the public health, safety or
17 welfare. Such crimes or acts shall include but not be limited to the following: Violating
18 or attempting to violate, directly or indirectly, or assisting in or abetting the violation
19 of, or conspiring to violate any provision of the Medical Practice Act.”

20 **FIRST CAUSE FOR DISCIPLINE**

21 **(Conviction of a Crime Substantially Related to the Qualifications, Functions or Duties of a
22 Physician and Surgeon)**

23 10. Respondent has subjected his Physician's and Surgeon's Certificate No. C33963 to
24 disciplinary action under sections 2227 and 2234, as defined by section 2236, subdivision (a), and
25 section 1360 of title 16 of the California Code of Regulations, in that he has been convicted of a
26 crime substantially related to the qualifications, functions and duties of a physician and surgeon.

27 The circumstances are as follows:

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1 11. From on or about January 2007¹ and continuing through on or about March 2011,
2 Respondent operated a surgery center, the Morrow Institute and Specialty Surgeons, Inc. and
3 Stellar Surgeries Specialties, Inc., in Rancho Mirage, California. Cosmetic and other types of
4 surgeries were performed at the surgery center, including abdominoplasty, tummy tucks,
5 rhinoplasty, septoplasty, breast augmentations, hernia repairs, gynecological surgery, and vein
6 procedures.

7 12. From on or about January 2007 and continuing through on or about March 2011,
8 certain cosmetic surgeries were billed to insurance companies as "medically necessary" so that
9 insurance companies would pay for them.

10 13. Respondent participated in a scheme to obtain money from the insurance companies
11 by means of false or fraudulent pretenses. More specifically, Respondent submitted altered
12 documents to the insurance companies in support of billings Respondent submitted to the
13 insurance companies. Such altered documents made and facts omitted as part of the scheme were
14 material to the insurance companies' decision to pay claims. While submitting these claims,
15 Respondent had the intent to defraud these insurance companies. Respondent later admitted that
16 the loss from the Respondent's scheme is valued at \$3,491,053.65.

17 14. On or about September 2, 2015, Respondent was federally indicted in the case
18 entitled, *United States of America v. The Morrow Institute Medical Group, Inc., David M.*
19 *Morrow, and Linda Morrow, Defendants*, Case No. SACR15-00099. Respondent was charged
20 with the following: 20 counts of a violation of 18 U.S.C. §§ 1341, 2(a), 2(b) [mail fraud]; one (1)
21 count of a violation of 18 U.S.C. § 1349 [conspiracy to commit mail fraud]; four (4) counts of a
22 violation of 26 U.S.C. § 7206(1) [making or subscribing to a false tax return]; and one (1) count
23 of a violation of 42 U.S.C. §§ 1320d-6(a)(3) and (b)(1) [unlawful disclosure of individually
24 identifiable health information].

25 15. On or about February 16, 2016, Respondent signed a plea agreement in the case
26 entitled, *United States of America v. The Morrow Institute Medical Group, Inc., David M.*

27 ¹ Conduct occurring more than seven (7) years from the filing date of this Accusation is for
28 informational purposes only and is not alleged as a basis for disciplinary action.

1 *Morrow, and Linda Morrow, Defendants*, Case No. SACR-15-00099, admitting to the factual
2 basis for Counts 21 and 22 of the Indictment, conspiracy to commit mail fraud and making or
3 subscribing to a false tax return.

4 16. On or about March 18, 2016, Respondent formally changed his plea from not guilty to
5 guilty for Counts 21 and 22 of the Indictment for Case No. SACR15-00099.

6 17. On or about October 2, 2017, Respondent was sentenced for his guilty plea to Counts
7 21 and 22 of the Indictment. Respondent's sentence included, but was not limited to commitment
8 to the custody of the Bureau of Prisons for a term of 240 months to be followed by supervised
9 release for a term of three (3) years, restitution, mental health treatment, outpatient substance
10 abuse treatment, and abstention from the use of alcohol and the unlawful use of controlled
11 substances.

12 **SECOND CAUSE FOR DISCIPLINE**

13 **(Commission of Any Act Involving Dishonesty or Corruption that is Substantially Related
14 to the Qualifications, Functions, or Duties of a Physician and Surgeon)**

15 18. Respondent has further subjected his Physician's and Surgeon's Certificate No.
16 C33963 to disciplinary action under sections 2227 and 2234, subdivision (e), of the Code, in that
17 he committed dishonest or corrupt acts substantially related to the qualifications, functions and
18 duties of a physician and surgeon, as more particularly alleged in paragraphs 11 through 17,
above, which are hereby incorporated by reference and re-alleged as if fully set forth herein.

19 **THIRD CAUSE FOR DISCIPLINE**

20 **(General Unprofessional Conduct)**

21 19. Respondent has further subjected his Physician's and Surgeon's Certificate No.
22 C33963 to disciplinary action under sections 2227 and 2234, in that he has engaged in conduct
23 which breaches the rules or ethical code of the medical profession, or conduct which is
24 unbecoming to a member in good standing of the medical profession as more particularly alleged
25 in paragraphs 11 through 18, above, which are hereby incorporated by reference and re-alleged as
26 if fully set forth herein.

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1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Board issue a decision:


4 1. Revoking or suspending Physician's and Surgeon's Certificate No. C33963, issued to
5 Respondent David M. Morrow, M.D.;

6 2. Revoking, suspending or denying approval of Respondent David M. Morrow, M.D.'s
7 authority to supervise physician assistants, pursuant to section 3527 of the Code, and advanced
8 practice nurses;

9 3. Ordering Respondent David M. Morrow, M.D., if placed on probation, to pay the
10 Board the costs of probation monitoring; and

11 4. Taking such other and further action as deemed necessary and proper.

12
13 DATED: October 23, 2017


14 KIMBERLY KIRCHMEYER
15 Executive Director
16 Medical Board of California
17 State of California
18 Complainant

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